

MEMO ENDORSED

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Hon. Denny Chin
Daniel Patrick Moynihan
United States Courthouse
500 Pearl St., Room 1020
New York, NY 10007

Re:

*Starr v. Time Warner Cable, Inc., et al.
CV 07-5871 (DC)*

Dear Hon. Denny Chin:

We are counsel to Plaintiff Zoe Starr in the above-referenced lawsuit. I am writing you today to request an adjournment of the court imposed June 13, 2008 discovery deadline.

Attached please find a letter from Ms. Starr explaining why she cannot appear for her deposition in person before June 13, 2008. In short, Ms. Starr's 87 year old mother traveled from Iran and is staying with Ms. Starr in Los Angeles. Ms. Starr cannot travel to New York as she has no one to attend to her mother, who is not in good health, while she is away. Ms. Starr's mother is returning to Iran on July 10, 2008. Ms. Starr will be able to travel to New York for her deposition any time thereafter.

We would like to point out to the Court that the discovery deadline was previously adjourned because there was outstanding discovery. Ms. Starr did not appreciate that the Court would extend the discovery deadline to overlap with her mother staying with her in Los Angeles. In order to honor the Courts' deadline, Ms. Starr volunteered to appear for her deposition via video. I spoke with Defendants' counsel, Richard Reice, regarding this matter and requested that a video deposition be taken of Ms. Starr prior to the June 13th deadline. Mr. Reice refused our request.

*The PTC is
adjourned from 6/13/08
to 8/1/08 at 10:30 am.
so ORDERED.
Sylv
wsd*

6/5/08

SYLVOR & RICHMAN, LLP

Ms. Starr respectfully requests that the discovery deadline be extended to after July 10, 2008 so that she will able to care for her mother without waiving or precluding any of her claims against the Defendant.

Thank you for your time and attention to this matter.

Sincerely,



Boris Sorin

cc:

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